



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 02/20/2001Time Start 1500 (3PM)Time Finish 03/12/2001
(1300) 1pm

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name B Brown Medical, Inc. I.D. Number PAD982679169Site Address 901 Maroon Blvd. Allentown, PA 18103-9341County Lehigh Municipality Hanover twp Zip 18103-9341Name of Inspector Stephen PurzioName & Title of Responsible Official Edward Brock, Senior Vice President of ManufacturingPerson Interviewed Stephen S. Stanick, E.H.S. Manager Telephone (610) 266-0500Mailing Address (if different from above) SAMEAmount of Hazardous Waste Generated per Month: >2200* Pounds _____ Kgs

1. Site Characterization:

* periodic generator

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large-Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types fluorescent lamps

3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage, Inc. License Number PA-AH 0067Transporter Name Dart Trucking Company License Number PA-AH 0219Transporter Name Safety Klean Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001	waste solvent and hydraulic fluid from equipment	Chemical Conservation of GA GAD 093380814
F002, F003	solvent rags with	Von Roll America
D001	Methylene Chloride	OHID 980613541
D001, D002	wastes from onsite lab	Environmental Enterprises
F002, F003		OHID 083377010
U044 U057		
*See 1999 Biennial Report for other waste streams		

NERO

BDO via C. Gitschier

HBG Central Office

USEPA

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B Braun Medical ID Number PAD 982679169 Date 02/20/2001
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1				Identification Number	262a.10	262.12	H002
1				Authorized transporters only	262a.10	262.12(c)	H003
1				Subsequent notification requirements met	262a.12(b)		H004
1				Proper manifest used	262a.10	262.21	H005
1				Manifests filled out correctly and completely	262a.20		H006
1				Manifests signed and routed properly	262a.23(a)	262.23	H007
		4		Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	3			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	3			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	3			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
	3			Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1				Specified records retained for three years	262a.10	262.40(c)	H014
1				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	3			Exception reporting procedures followed	262a.42	262.42	H016
	3			Spill reporting procedures followed	262a.10	262.34(d)	H017
1				PPC plan developed and implemented	262a.10	262.34(a)	H018
	2			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	3			Source reduction strategy prepared and available (LQG only)	262a.100		H020
	3			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name B Braun Medical ID Number PAD 982677169 Date 02/20/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			4	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
		3		Containers of hazardous waste in good condition	265a.1	265.171	H026
1				Containers and stored waste compatible	265a.1	265.172	H027
			4	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
		3		Containers managed to prevent leaks	265a.1	265.173(b)	H029
			4	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
			4	Container storage areas inspected at least weekly	265a.1	265.174	H031
		3		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		3		Proper containment and collection systems in place	265a.179		H033
			4	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			4	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			4	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			4	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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Site Name B Braun Medical ID Number PAD 982679169 Date 02/20/2001

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STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	2			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	✓			Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	2			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	✓			Incompatible waste requirements met	265a.1	265.201(f)	H059

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INSPECTION REPORT COMMENTS

Date of Inspection 02/28/2001 Identification Number PAD 982679169
Company/Facility/Site Name B Braun Medical, Inc.

I conducted an inspection of B Braun Medical, Inc. on 02/28/2001 with Stephen Stancick, Wendy Bonis and David Lauer of the facility. B Braun Medical, a listed large quantity generator of hazardous waste, manufactures plastic disposable medical devices at this facility. A follow up site visit was conducted on March 7, 2001 to review site records. This report was completed at the facility on March 12, 2001.

During the February 20, 2001 site inspection, the hazardous waste accumulation storage area was inspected. The storage area was located on the east side of the facility, just outside of the main building. The storage area contained thirteen (13), 55 gallon drums of hazardous waste. In addition to the drums, approx. twelve (12), clear bags of hazardous waste (solvent rags) were laying on the ground next to the containment pallet used to hold hazardous waste solvent. The bags didn't have any hazardous waste or identification labels on them. Several of the bags were partially open. The layout of the storage area and debris such as pallets, made inspection of the drums difficult. The bags of solvent rags blocked inspection of the drums in the containment pallet. The facility also placed empty containers in the storage pallet and a 'ree/bag' of waste in the

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does knowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 03/12/01
Inspector (signature) [Signature] Date 03/12/2001

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Date of Inspection 02/20/2001 Identification Number PAD982679169
Company/Facility/Site Name B Braun Medical, Inc.

The empty containers, in addition to a IW ("red bag") which was located between the two containers of hazardous waste solvent, prevented a full inspection of the drums of hazardous waste.

During the initial inspection on 02/20/2001, the facility was unable to provide records documenting that the accumulation storage area was being inspected. During the followup visit on 03/07/2001, it was discovered that the facility had not been conducting weekly inspections on the storage area since 10/16/2000. This was the last documented date in the inspection record for this area.

The facility was unable to locate the current (latest) source reduction strategies for the hazardous waste streams. The facility does have a company waste minimization plan and has reduced the quantity of hazardous waste generated. The facility should insure source reduction strategies are completed for each hazardous waste stream. A copy of the source reduction strategies should be sent to this inspector.

The facility should send this inspector documentation on the annual updates for the personnel ^{hazardous waste} training.

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Inspector (signature) [Signature] Date 03/12/2001

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Date of Inspection 02/20/2001Identification Number PAD 982679169Company/Facility/Site Name B Braun Medical, Inc.

The following containers were located in the hazardous waste accumulation storage area on 02/20/2001:

twelve (12) bags 'Solvent rags' (bags without labels)

One (1) drum 'Trisodium Phosphate Crystalline' labeled hazardous waste dated 10/03/2000

One (1) drum 'Catch All Drum' labeled hazardous waste dated 11/29/2000

two (2) drums 'waste solvent' (on containment) labeled hazardous waste (pallet) dated 1.) 10/12/2000 2.) 10/12/2000

Eight (8) drums 'Solvent rags' labeled hazardous waste dated 1.) 10/03/2000 2.) 10/05/2000 3.) 12/17/2000 4.) 12/19/2000 5.) 12/29/2000 6.) 1/5/2001 7.) 1/17/2001 8.) 1/31/2001

One (1) drum 'Expired Chemicals' (non-hazardous waste)

Seven (7) boxes 'I V bags' (returned product) non-hazardous

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INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001Identification Number PAD982679169Company/Facility/Site Name B Braun MedicalViolations

- 1.) B Braun Medical accumulated hazardous waste onsite for more than 90 days in violation of 40 CFR Part 262.34(a) as incorporated by 25 PA code Chapter 262a.10. Five (5) drums of hazardous waste have been accumulating onsite for more than 90 days.
- 2.) B Braun Medical failed to manage containers of hazardous waste in compliance with 40 CFR Part 265 subpart I and 25 PA code Chapter 265a Subchapter I in violation of 40 CFR Part 262.34 as incorporated by 25 PA code Chapter 262a.10. (see violation below)
- 3.) B Braun Medical failed to keep containers of hazardous waste closed except during addition or removal of waste in violation of 40 CFR Part 265.173(a) as incorporated by 25 PA code Chapter 265a.1. Several plastic bags of hazardous waste that contained solvent rags were partly open during the 2/20/2001 site inspection.
- 4.) B Braun Medical failed to insure proper container configuration and spacing for safe management and access for inspection purposes in violation of 25 PA code Chapter 265a.173. Bags of hazardous waste

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INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001Identification Number PAD 982679169Company/Facility/Site Name B Braun Medical, Inc

Violations (continue)

blocked aisles and access to containers of hazardous waste in the accumulation storage areas

5.) B Braun Medical failed to inspect the hazardous waste accumulation storage area weekly in violation of 40 CFR Part 265.174 as incorporated by 25 PA code Chapter 265a.1. The facility had not been conducting weekly inspections of the storage area. The last documented inspection of the storage area occurred on October 16, 2000.

6.) B Braun Medical failed to insure that air emission standards were being complied with (AA, BB, CC) in violation of 40 CFR Part 265.178 as incorporated by 25 PA code Chapter 265a.1. Several bags of hazardous waste solvent rags were partly open.

7.) B Braun Medical failed to clearly mark containers of hazardous waste with accumulation dates in violation of 40 CFR Part 262.34(a)(2) as incorporated by 25 PA code Chapter 262a.10. Approx twelve (12) bags of solvent rags lacked a accumulation date.

8.) B Braun Medical failed to label containers of hazardous waste with a hazardous waste label

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INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001 Identification Number PAD 982679169Company/Facility/Site Name B Braun Medical, Inc.Violations (continue)in violation of 40 CFR Part 262.34 (a)(3) as incorporated
by 25 PA code Chapter 262a.10. Approx. twelve (12)
bags of solvent rags lacked a "hazardous waste"
label.9.) B Braun Medical failed to accurately identify
the contents of containers of hazardous waste
stored in the accumulation area in violation of
SWMA 6018.403 (b)(2). Approx. twelve (12)
bags of solvent rags lacked any identification labels.

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Person interviewed (signature) [Signature] Date 03/14/01Inspector (signature) [Signature] Date 03/12/2001

EVALUATION - VIOLATION - ENFORCEMENT FORM

07/97 VERSION

Handler ID Number

PAD 982679169

RCRA Non-Notifier YES [] NO [X]

If YES, the handler section must be completed.

Handler Name

B Braun Medical, Inc.

Street

901 Maroon Blvd

City

Allentown

State

PA

Zip Code

18103-9341

County or County Code

Lehigh

Contact

Stephen S. Stancick

UNIVERSE CHANGE REQUIRED

YES []

NO [X]

or Indicate Universe Status of the RCRA Non-Notifier

I. Indicate the facility's current Universe(s):

III. Indicate the new transporter status:

II. Indicate the new RCRIS Generator Universe:

LQG []

SQG []

CEG []

NON-HANDLER []

CLOSED []

NOTE: All TSD activities changes must be handled by the state data coordinator and cannot be made using this form

Transporter []

You must check at least one of the boxes

Mark Mode of Transportation

[] Air

[] Rail

[] Highway

[] Water

[] Other

Non-Transporter []

Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.

EVALUATION

Add [X] Change

Delete

Date

Number

Agency

Type

Reason

Branch

Person

022001

S

CEI

P.A.S.D.P.

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GGR [E]	GSC []	TWD []	DGW []	DOR []	DWP []	BRR []	FEA []
GLB [E]	GSQ []	DCH []	DLB []	DPB []	DIN []	BPS []	CSS []
GMR [E]	GEX []	DCL []	DLF []	DPP []	DIA []	BIS []	UOR []
GOR [E]	TGR []	DCP []	DLT []	DSI []	DPS []	BCE []	SCC [E]
GPT []	TMR []	DFR []	DMC []	DTR []	DOP []	BDT []	[]
GRR [E]	TOR []	DGS []	DMR []	DTT []	DMI []	CAS []	[]

Comments Violations Noted

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION

Add [X] Change

Delete

Link to Above Evaluation? [Y/N] Y

Agency

Number

Area

Class

Regulation Type

Regulation Citation

S

GGR

I

40 CFR Part 262.34a

Date Determined

Priority

Branch

Person

Scheduled

Returned to Compliance

Scheduled

Actual

022001

P.A.S.D.P.

Comments

Accumulated hazardous waste onsite greater than 90 days

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data

☐ Not Required by EPA

ADDITIONAL VIOLATIONS FORM

PLEASE ATTACH TO EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number	Handler Name
PAD 98 4679 169	B Braun Medical
VIOLATION	Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/> Link to Above Evaluation? (Y/N) <input checked="" type="checkbox"/> Y

Agency	Number	Area	Regulation Type	Regulation Citation
S		GGR		40 CFR Part 265.174
Date Determined	Priority	Branch	Person	Returned to Compliance
022001			PASDP	Scheduled Actual
Comments Failed to inspect storage area weekly				

VIOLATION	Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/> Link to Above Evaluation? (Y/N) <input checked="" type="checkbox"/> Y
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Agency	Number	Area	Regulation Type	Regulation Citation
S		SIC		40 CFR Part 265.178
Date Determined	Priority	Branch	Person	Returned to Compliance
022001			PASDP	Scheduled Actual
Comments Failed to insure Air Emission Standards met				

VIOLATION	Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/> Link to Above Evaluation? (Y/N) <input checked="" type="checkbox"/> Y
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Agency	Number	Area	Regulation Type	Regulation Citation
S		GGR		40 CFR Part 262.34(a)(3)
Date Determined	Priority	Branch	Person	Returned to Compliance
022001			PASDP	Scheduled Actual
Comments Failed to mark accumulation dates on containers				

VIOLATION	Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/> Link to Above Evaluation? (Y/N) <input checked="" type="checkbox"/> Y
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Agency	Number	Area	Regulation Type	Regulation Citation
S		GGR		40 CFR Part 262.34(a)(3)
Date Determined	Priority	Branch	Person	Returned to Compliance
022001			PASDP	Scheduled Actual
Comments Failed to place hazardous waste labels on containers				

VIOLATION	Add <input type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/> Link to Above Evaluation? (Y/N) <input type="checkbox"/> N
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Agency	Number	Area	Regulation Type	Regulation Citation
Date Determined	Priority	Branch	Person	Returned to Compliance
				Scheduled Actual
Comments				